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Attorneys for Plaintiff
GSI TECHNOLOGY, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

GSI TECHNOLOGY, INC., a Delaware
corporation,

Plaintiff,

v.

CYPRESS SEMICONDUCTOR
CORPORATION, a Delaware corporation,

Defendant.

Case No. 5:11-cv-03613-EJD

**STIPULATION AND [PROPOSED]
ORDER REGARDING ~~LIMITED~~
REOPENING OF DISCOVERY AND
MODIFICATION OF DISPOSITIVE
MOTION BRIEFING SCHEDULE
(AMENDED)**

Plaintiff GSI Technology, Inc. (“GSI”) and Defendant Cypress Semiconductor Corporation (“Cypress”), by and through their respective counsel of record, hereby agree and stipulate to the following:

1. On April 25, 2014, the Court approved the Parties’ Stipulation Regarding Limited Reopening of Discovery and Modification of Dispositive Motion Briefing Schedule and Order [ECF 70]. The Court’s April 25, 2014 Order provided for the completion of certain depositions on or before May 23, 2014. One necessary GSI witness is unavailable until June and that

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witness's deposition may impact Cypress's decision to exercise its right under the Court's April 25, 2014 Order to take one additional deposition of a GSI witness. Accordingly, the Parties hereby request the following revision to the deposition schedule:

(a) All depositions shall be complete on or before June 13, 2014.

3. Under the current briefing schedule, dispositive motions must be filed no later than May 30, 2014, oppositions shall be filed by July 7, 2014, and reply memoranda shall be filed by August 4, 2014. The hearing date is set for September 5, 2014 at 9:00 AM. The Parties jointly request that the Court approve and adopt the following modified briefing schedule so that dispositive motions are due after the completion of depositions:

(a) Dispositive motions and any motions pursuant to *Daubert v. Merrell Dow Pharmaceuticals*, 509 U.S. 579 (1993), shall be filed and served no later than June 20, 2014;

(b) Memoranda in Opposition shall be filed and served no later than July 28, 2014;

(c) Reply Memoranda shall be filed no later than August 25, 2014; and

(d) The hearing date shall remain as set for September 5, 2014 at 9:00 AM.

IT IS SO STIPULATED.

Respectfully submitted,

DATED: May 9, 2014

SHARTSIS FRIESE LLP

By: /s/ Robert E. Schaberg

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DATED: May 9, 2014

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By: /s/ Lee H. Rubin


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Attorneys for Defendant
CYPRESS SEMICONDUCTOR
CORPORATION

ATTESTATION: The Filer attests that concurrence in the filing of this document has been obtained from all signatories.

Pursuant to stipulation, IT IS SO ORDERED AS MODIFIED.

Dated: May 13, 2014



The Honorable Edward J. Davila
United States District Court

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